

From: Katie Kalahar <KKalahar@goodmankalahar.com>
Sent: Thursday, May 22, 2025 2:09 PM
To: Elizabeth Marzotto Taylor
Cc: Amber Dees; Deborah Gordon; Dora Koski; Elizabeth Hardy; Jill Hall; Jordan Anderson; Michelle Beveridge; Morry Hutton; Randi McGinn; Sarah Gordon Thomas; Teresa D'Costa; Thomas Davis
Subject: Re: Amanda Fox Subpoena

EXHIBIT 2

External (kkalahar@goodmankalahar.com)



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Yes, we will.

On May 22, 2025, at 12:28 PM, Elizabeth Marzotto Taylor <emt@deborahgordonlaw.com> wrote:

Hi Katie,
Please advise if you will accept service of OMP's subpoenas for Ms. Fox's documents and deposition testimony.

Thanks,

Elizabeth Marzotto Taylor | Attorney & Counselor |

DEBORAH GORDON LAW

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From: Katie Kalahar <KKalahar@goodmankalahar.com>
Date: Wednesday, May 21, 2025 at 5:11 PM
To: Amber Dees <adees@goodmankalahar.com>, Deborah Gordon <dgordon@deborahgordonlaw.com>, Dora Koski <dkoski@deborahgordonlaw.com>, Elizabeth Hardy <ehardy@khvpf.com>, Elizabeth Marzotto Taylor <emt@deborahgordonlaw.com>, Jill Hall <jhall@khvpf.com>, Jordan Anderson <jordan@mcginnlaw.com>, Michelle Beveridge <mbeveridge@khvpf.com>, Morry Hutton <mhutton@deborahgordonlaw.com>, Randi McGinn <randi@mcginnlaw.com>, Sarah Gordon Thomas <stthomas@deborahgordonlaw.com>, Teresa D'Costa <teresa@deborahgordonlaw.com>, Thomas Davis <tdavis@khvpf.com>
Subject: Amanda Fox Subpoena

Dear Mr. Davis,

We represent Ms. McKenna's law partner, nonparty Amanda Fox Perry. She was recently served with a subpoena in this case. To the extent the subpoena seeks documents protected by the attorney-client privilege and/or work product doctrine, Ms. Fox Perry respectfully objects. Ms. Fox Perry has provided confidential legal advice to Ms. McKenna concerning this action. Such communications, if any, will be redacted from her production and identified on a privilege log. Fox McKenna represents the PHPA. Confidential communications, if any, between the firm's partners, Ms. Fox Perry and Ms. McKenna, concerning their representation of their firm's client, as well as confidential communications, if any, between Ms. Fox Perry and the PHPA, will be redacted from her production and identified on a privilege log.

Ms. Fox Perry respectfully requests an extension of time to June 5, 2025, to otherwise respond to the subpoena. Please let us know.

Regards,

Kathleen J. Kalahar
Goodman Kalahar
1394 E. Jefferson Ave.
Detroit, MI 48207
(248) 310-0133